

1 THE HONORABLE JOHN C. COUGHENOUR
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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE

11 UNITED STATES,

12 Plaintiff,

13 vs.

14 KENNETH WARREN RHULE and
15 KENNETH JOHN RHULE,

16 Defendants.

Case No. 2:20-cr-00105-JCC

17 STIPULATION AND [PROPOSED]
18 ORDER RE-NOTING
19 GOVERNMENT'S MOTION FOR
20 ENTRY OF A PROTECTIVE ORDER
21 RESTRAINING CERTAIN
22 FORFEITABLE PROPERTY (Dkt. 72)
23 AND EXTENDING TIME TO
24 RESPOND

25 **Note on Motions Calendar: October 7,
2020**

26 The government and defendants Kenneth Warren Rhule and Kenneth John Rhule, by and
27 through their respective attorneys, hereby STIPULATE AND AGREE as follows:

28 1. On September 30, 2020, the government filed a “motion for entry of a protective order
29 restraining certain forfeitable property” (Dkt. 72). That motion is currently noted on the
30 motions calendar for October 9, 2020.

31 STIPULATION AND [PROPOSED] ORDER RE-
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35 PROPERTY (Dkt. 72) AND EXTENDING TIME
36 TO RESPOND
(Case No. 2:20-cr-00105-JCC) - 1

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38 **CALFO EAKES LLP**
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2. Counsel have stipulated to re-note the motion for October 16, 2020, and to allow the defendants an additional seven days to respond, such that any response will now be due on October 14, 2020, as reflected in the chart below:

Event	Current Date	Proposed Extension
Noting date for Dkt. 72	10/9/20	10/16/20
Deadline for Response to Dkt. 72	10/7/20	10/14/20

3. The parties stipulate and agree that there is good cause for this extension. The extension is needed to allow counsel for the defendants adequate time to confer with their clients, one of whom remains in custody with limited ability to communicate with counsel. The additional time also allows defense counsel time to confer with the government and to potentially seek a negotiated agreement that would resolve the motion.

4. The parties do not seek the adjustment of any other case deadlines at this time.

SO STIPULATED.

DATED this 7th day of October, 2020.

Respectfully submitted,

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LAW OFFICES
CALFO EAKES LLP

[PROPOSED] ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

DATED this _____ day of _____, 2020.

JOHN C. COUGHENOUR
UNITED STATES DISTRICT JUDGE

Presented by:

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